

COMPLIANCE CHART

WSIA  **Data Security Laws**
updated August 2021

State	Disposition	Effective date	Program deadline	3 rd party compliance deadline	Domestic Insurer Certification	Breach notification	Relevant exemptions	Other
Alabama	Enacted	4/25/2019	4/25/2020	4/25/2021	Feb. 15 annually	3 days	Less than 25 employees, \$5 million gross annual revenue or \$10 million year-end assets	
Alaska	No bill							
American Samoa	No bill							
Arizona	No bill							
Arkansas	No bill							
California	No bill							California passed the California Consumer Privacy Act in 2018 granting consumers certain rights regarding their data but differs significantly from NAIC Data Security Efforts.
Colorado	No bill							
Connecticut	Enacted	10/1/2019	10/1/2021 (Previously 10/1/2020)	10/1/2022 (Previously 10/1/21)	April 15 annually (Previously Feb. 15 annually)	3 days	Less than 20 employees (until 9/30/22, previously 9/30/21), less than 10 employees (until 10/1/22, previously 10/1/21), compliance with another state as approved by commissioner via regulation	2021 HB 6391 made changes to the law which include clarifying that scope of law is limited to nonpublic information. Previous law allowed licensees in compliance with another state to have been deemed to satisfy the requirements but that was changed to only allow those who have complied with the NY requirements to be deemed in compliance. The law also delays program deadline to 10/1/2021 (previously 10/1/20) and 3rd party deadline to 10/1/22 (previously 10/1/21). Extends exemptions for small employers (20 and 10 employees) by one year.
Delaware	Enacted	7/31/2019	7/31/2020	7/31/2021	Feb. 15 annually	3 days	Less than 15 employees,	
Dist. of Columbia	No bill							
Florida	No bill							
Georgia	No bill							
Guam	No bill							
Hawaii	Enacted	7/1/2021	7/1/2022	7/1/2023	March 31 annually	3 days	Less than 10 employees	
Idaho	Failed in 2021							HB 147 failed in 2021
Illinois	Bill pending							
Indiana	Failed in 2019							The underlying bill passed but was stripped of provisions that would have urged the legislative council to perform an interim study on the topic of insurance data security.
Iowa	Enacted	1/1/2022	1/1/2024	1/1/2024	April 15 annually	3 days	Less than 20 employees, \$5 million gross annual revenue or \$10 million year-end assets	
Kansas	No bill							
Kentucky	No bill							
Louisiana	Enacted	8/1/2021	8/2/2021	8/1/2022	Feb. 15 annually	3 days	Less than 25 employees, \$5 million gross annual revenue or \$10 million year-end assets	
Maine	Enacted	1/1/2022	1/1/2022	1/1/2023	April 15 annually	3 days	Less than 10 employees	
Maryland	No bill							
Massachusetts	No bill							
Michigan	Enacted	1/20/2021	1/20/2022	1/20/2023	Feb. 15 annually	10 days	Less than 25 employees	Affirmative defense/Safe harbor provisions
Minnesota	Enacted	8/1/2021	8/1/2022	8/1/2023	April 15 annually	5 days	Less than 25 employees	
Mississippi	Enacted	1/7/2019	1/7/2020	1/7/2021	Feb. 15 annually	3 days	Less than 50 employees, \$5 million gross annual revenue or \$10 million year-end assets	
Missouri	No bill							
Montana	No bill							
Nebraska	No bill							
Nevada	Failed in 2019							
New Hampshire	Enacted	1/1/2020	1/1/2021	1/1/2022	March 1 annually	3 days	Less than 20 employees, employee/agent of a licensee	Safe harbor for NY compliance
New Jersey	No bill							
New Mexico	No bill							

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New York	Regulation 23 NYCRR 500 Enacted	3/1/2017	3/1/2018	9/1/2018	Feb. 15 annually. In NY all licensees, including surplus lines brokers, are subject to the annual certification requirement.	3 days	Less than 50 employees, \$5 million gross annual revenue or \$10 million year-end assets	New York Regulations are typically more extensive than the NAIC Model. See Cybersecurity Resource Center for more details.
North Carolina	No bill							
North Dakota	Enacted	8/1/2021	8/1/2022	8/1/2023	April 15 annually	3 days	\$5 million gross annual revenue or \$10 million year-end assets, 50 employees between 8/1/2021 and 7/31/2023, 25 employees after 7/31/21	
Northern Mariana Islands	No bill							
Ohio	Enacted	3/20/2019	3/20/2020	3/20/2021	Feb. 15 annually	3 days	Less than 20 employees, \$5 million gross annual revenue or \$10 million year-end assets	Affirmative defense/Safe harbor provisions
Oklahoma	No bill							
Oregon	No bill							
Pennsylvania	No bill							
Puerto Rico	No bill							
Rhode Island	2021 bill held for further study							
South Carolina	Enacted	1/1/2019	7/1/2019	7/1/2020	Feb. 15 annually	3 days	Less than 10 employees	
South Dakota	No bill							
Tennessee	Enacted	5/6/2021	7/1/2022	7/1/2023	April 15 annually	3 days	Less than 25 employees, \$5 million gross annual revenue or \$10 million year-end assets	
Texas	No bill							
U.S. Virgin Islands	No bill							
Utah	No bill							
Vermont	No bill							
Virginia	Enacted	7/1/2020	Unclear	7/1/2022	Feb. 15 annually (beginning 2023)	3 days		
Washington	No bill							
West Virginia	No bill							
Wisconsin	Enacted	11/1/2021	11/1/2022	N/A	March 1 annually	3 days	Deadlines for compliance are estimates and will be updated upon publication.	
Wyoming	No bill							

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If you have any questions or notice any errors please contact Senior State Relations Manager, John Meetz, at john@wsia.org